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October 29, 2021

VIA EFILE

Hon. Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square, Room 240  
New York, NY 10007  
(212) 805-6350  
CaproniNYSDCChambers@nysd.uscourts.gov

Re: Syracuse Mountains Corp. v. Petróleos de Venezuela S.A., No. 21-cv-2684-VEC

Dear Judge Caproni:

We represent plaintiff Syracuse Mountains Corporation (“Syracuse”) in the above-referenced action. We write jointly with counsel for defendant Petróleos de Venezuela S.A. (“PDVSA”) to submit the enclosed Stipulated Confidentiality Agreement and Protective Order.

Discovery in this matter is set to commence and the parties believe that they may possess sensitive commercial, financial, or other confidential information, which may be requested or need to be disclosed in the course discovery. The Stipulated Confidentiality and Protective Order sets forth a framework and procedure for the discovery of materials designated as confidential.

The parties respectfully submit that use of the Stipulated Confidentiality Agreement and Protective Order will streamline and expedite the discovery process. We present this signed Stipulated Confidentiality Agreement and Protective Order for Your Honor’s review and consideration for it to be So Ordered.

Respectfully submitted,

/s/ Nicolas Swerdloff  
Nicolas Swerdloff  
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/s/ Dennis H. Tracey  
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